

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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**IN RE TERRORIST ATTACKS ON
SEPTEMBER 11, 2001**

**Civil Action No.
03 MDL 1570**

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This document relates to:

Burnett, et al. v. Al Baraka Inv. & Dev. Corp., et al., Case No. 03-cv-9849 (GBD)(SN)
(S.D.N.Y.)

Burnett, et al. v. Islamic Republic of Iran, et al., Case No. 15-cv-9903 (GBD)(SN)
(S.D.N.Y.)

**MOTION TO SUBSTITUTE PARTIES PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE 15(d)**

Pursuant to Federal Rule of Civil Procedure 15(d), Plaintiffs herein move the Court to allow substitution of the following parties in the above referenced actions. The individuals being substituted into the case were identified as “DOE” plaintiffs and as minors represented by “DOE” plaintiffs at the time that the case was initially instituted; were identified as such in the initial pleading; and have since consented to being named in the Complaint according to their legal names.

The following chart demonstrates the manner in which these individuals were previously named in the Complaints and also identifies how they wish to proceed going forward:

Identification of Party to be Substituted (Plaintiff's name and relationship to Decedent)	State of Residency at Filing	Reference to Plaintiff in ECF No. 53 (15-cv-9903) and ECF No. 432-2 (02-cv-1616 (D.D.C.))	Decedent's Name	Paragraph of Complaint Discussing Decedent
DENISE EILEEN MCDONALD, individually as the Spouse and as the Personal Representative of the Estate of Joseph Paul	NJ	Spouse DOE AP290 as Personal Representative of the Estate of DOE AP290, Deceased and on behalf of all beneficiaries of DOE	McDonald, Joseph Paul	ECF No. 53 (15-cv-9903) at ¶3069; ECF No 432-2

McDonald, Deceased and on behalf of all beneficiaries of Joseph Paul McDonald		AP290, Deceased / WIFE DOE # 139 (AP290) [in multiple capacities: individually, as Personal Representative of the Estate of Joseph Paul McDonald, and as Guardian of minor children K.E.M. and B.A.M.]		(02-cv-1616 (D.D.C.))
KATHLEEN E. MCDONALD, individually as the Child of Joseph Paul McDonald, Deceased	NJ	Spouse DOE AP290 as Personal Representative of the Estate of DOE AP290, Deceased and on behalf of all beneficiaries of DOE AP290, Deceased / WIFE DOE # 139 (AP290) [in multiple capacities: individually, as Personal Representative of the Estate of Joseph Paul McDonald, and as Guardian of minor children K.E.M. and B.A.M.]	McDonald, Joseph Paul	ECF No. 53 (15-cv-9903) at ¶3069; ECF No 432-2 (02-cv-1616 (D.D.C.))
BRIGID A. MCDONALD, individually as the Child of Joseph Paul McDonald	NJ	Spouse DOE AP290 as Personal Representative of the Estate of DOE AP290, Deceased and on behalf of all beneficiaries of DOE AP290, Deceased / WIFE DOE # 139 (AP290) [in multiple capacities: individually, as Personal Representative of the Estate of Joseph Paul McDonald, and as Guardian of minor children K.E.M. and B.A.M.]	McDonald, Joseph Paul	ECF No. 53 (15-cv-9903) at ¶3069; ECF No 432-2 (02-cv-1616 (D.D.C.))

Plaintiffs propose that, upon endorsement of Plaintiffs' Proposed Order, the substituted party would be individually entered as a Plaintiff into the Court's ECF system to ease the burden on the Clerk of the Court's Office and based on the size of this MDL.

Dated: June 29, 2021

Respectfully submitted,

/s/ John M. Eubanks

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